

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT
OF DELAWARE

Ernest A. Crump Jr,)	doc#3
plaintiff,)	
v.)	C.A. 04- 329-SLR
Robert May)	
et al)	
defendants,)	



PLAINTIFFS INTERROGATORIES - FIRST SET
TO DEFENDANT ROBERT MAY

To the defendant, Robert May,

You are hereby notified to answer under oath, the interrogatories numbered 1 to 14, inclusive as shown below, within 30 days of the time service is upon you, in accordance with Rule 33 of the Federal Rules of Civil Procedures.

Interrogatory No. 1. Is'nt it true that you filed a warrant against the plaintiff on 08-29-02 for escape after conviction ?.

Interrogatory No. 2. Is'nt it true that you, along with the Emergency Response Team, apprehended the plaintiff on 08-29-02 and returned him back to Morris Community Correctional Center on 08-29-02 ?.

Interrogatory No. 3. Is'nt it true that immediately after a inmate is apprehended on a warrant, he's suppose to be placed under arrest, the warrant be executed and he appears before the nearest magistrate available without unreasonable delay ?.

Interrogatory No. 4. Is'nt it true that the nearest magistrate available from Morris Community Correctional Center is less than 5 minutes away ?.

Interrogatory No. 5. Is'nt it true, that although the plaintiff was returned to Morris Community Correctional Center on 08-29-02, and remained housed at Morris Community Correctional Center until 08-30-02, he still was'nt taken to the nearest magistrate on 08-29-02 or 08-30-02 or any other time while he was at Morris Commuunity Correctional Center ?.

Interrogatory No. 6. Is'nt it true that the plaintiff was Administratively Transferred from Morris Community Correctional Center to Delaware Correctional Center on 08-30-02 without the escape warrant being executed ?.

Interrogatory No. 7. Is'nt it true that when a inmate is Administratively Transferred to another correctional facility and will not be returning back to the facility he was transfered from, his personal property is suppose to be inventoried by the sending institution and then transfered along with that inmate to the receiving institution ?.

Interrogatory No. 8. Is'nt it true that on 08-29-02 and 08-30-02, you were Corporal Thomas Rygil's immediate supervisor ?.

Interrogatory No. 9. Is'nt it true that you didn't stop Corporal Thomas Rygil from taking off the plaintiff's body on 08-30-02 before he was transfered to Delaware Correctional Center, the following items; his 2 rings, 2 necklaces, 1 watch, 1 pair of shoes, 1 shirt, 1 belt and pants ?.

Interrogatory No. 10. Is'nt it true that you allowed Corporal Thomas Rygil to have the plaintiff put on Department of Corrections clothes and sneakers after he took the plaintiffs personal property ?.

Interrogatory No. 11. Is'nt it true that none of the plaintiffs personal property, including his Holy Quran, Kufi, Legal paperwork, Hygenic articles or the items taken off his body by Corporal Rygil, was transfered along with him to Delaware Correctional Center on 08-30-02 or any other time ? .

Interrogatory No. 12. Is'nt it true that you made the decision not to send the plaintiffs personal property along with him to Delaware Correctional Center when he was Adminisrtatively Transfered from Morris Community Correctional Center on 08-30-02 ?.

Interrogatory No. 13. If you answered no to interrogatory No. 12., then state who made that decision. If you answered yes to interrogatory No. 12., then go to interrogatory No. 14.

Interrogatory No. 14. Is'nt it true that the plaintiffs personal property, in particular, his Holy Quran, Kufi, Hygenic Articles and his Jewelry and watch taken off his body, could have been transfered along with him when he was Administratively Transfered to Delaware Correctional Center on 08-30-02 ?.

Dated: 06 - 27, 2005


Plaintiff

Address: Delaware Corr. Center
1181 Paddock Road
Smyrna, DE 19977